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August 28, 2017

Reply To: Thomas Brett
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Our File No. 174515

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
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Attention: Kirsten Walli,
Board Secretary

Dear Ms. Walli:

Re: EB-2017-0024: Alectra Utilities Corporation, 2018 EDR Application

BOMA is of the view that this application should proceed by way of an oral hearing for several reasons.

First, Alectra has filed a 400 page long Distribution System Plan (the "Plan") for its Enersource rate zone. This is Alectra's first plan under the RRFE regime and one that Enersource was required to file by the Board. The Board needs to review the Plan prior to approving the Enersource rate zone's 2018 rates. A proper review of the Plan requires an oral hearing.

Second, among the key requirements for rate applications and plans under RRFE is that the utility undertake a comprehensive and effective consultation process with its ratepayers, and demonstrate how it has adjusted its rate application and Plan to reflect customer needs and preferences. BOMA has several questions about the conduct and content of the ratepayer consultation with Enersource and Powerstream ratepayers, including:

- The consultation appears to have been completed only a few weeks, in part as little as three weeks, before the application was filed.
- The rate proposals do not appear to reflect the ratepayer needs and preferences as revealed in the consultation.

- Pacing of capital projects in the Plan that is required by the RRFE appears to be minimal in relation to the overall size and complexity of the forecast capital budget. In addition, some of the items that Alectra proposes to defer, such as a system access project driven by a Metrolinx investment, is one, the timing of which Alectra has no control.
- There appears to have been insufficient consultation with the Brampton rate zone ratepayers.

Third, the sheer size and complexity of the application, including as it does, proposed 2018 rates for the Enersource, Brampton, Powerstream and Horizon divisions, 2018 ICMs for Enersource and Powerstream, and an initial DSP for Enersource, require an oral hearing to ensure a diligent and sufficient review by ratepayer representatives. The application is too complex and raises too many questions to be compressed into a written proceeding.

Fourth and finally, the application raises questions, both as to the magnitude of Alectra's corporate costs (for example, compensation for its board of directors) and the allocation of those costs among ratepayers.

Yours truly,

FOGLER, RUBINOFF LLP



Thomas Brett

TB/dd

cc: All Parties (*via email*)